

# EXHIBIT 6

CAUSE NO. 202016545

WILLIAM JOYCE	§	IN THE DISTRICT COURT OF
	§	
Plaintiff,	§	
	§	
v.	§	
	§	HARRIS COUNTY, TEXAS
ARKEMA INC. AND GREAT WESTERN	§	
VALVE, INC.	§	
	§	
Defendants.	§	127 <sup>TH</sup> JUDICIAL DISTRICT

**ORIGINAL ANSWER**

Defendant Arkema Inc. (“Arkema” or “Defendant”) files this Original Answer to Plaintiff’s Original Petition and Requests for Disclosure (the “Petition”) and would respectfully show the Court as follows:

**I. GENERAL DENIAL**

1. Under Texas Rule of Civil Procedure 92, Arkema generally denies all the allegations contained in William Joyce’s (“Plaintiff”) Petition. Arkema requests that Plaintiff be required to prove the allegations contained therein as required under Texas law and under the Texas Constitution.

**II. AFFIRMATIVE DEFENSES**

2. Without assuming any burden of proof properly with Plaintiff, Arkema asserts the following defenses:

- a. Plaintiff’s Petition fails to state a claim upon which relief may be granted;
- b. Plaintiff’s own acts or omissions caused or contributed to his alleged injury; and
- c. Plaintiff failed to fully mitigate damages.

3. Arkema reserves the right to plead additional affirmative defenses.

**III. EXEMPLARY DAMAGES**

4. If Defendant is found liable for exemplary damages, those damages must be capped

under the Texas Damages Act, the Due Process Clause of the United States Constitution, and the Due Course of Law provisions of the Texas Constitution.

5. To the extent necessary, Defendant pleads mitigation of exemplary damages.

#### **IV. PRAYER**

6. For these reasons, Arkema respectfully submits this its Original Answer and prays that the Court order Plaintiff to take nothing by this suit and that the Court grant Arkema such other and further relief, both at law and in equity, both general and specific, to which it may be justly entitled.

Respectfully submitted,

By: /s/ Chris Reynolds

Chris Reynolds

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**ATTORNEYS FOR DEFENDANT  
ARKEMA INC.**

**CERTIFICATE OF SERVICE**

I certify that on April 24, 2020, a true and correct copy of the foregoing document was served electronically on all known counsel of record via EFileTXCourts.gov.

/s/ Harris Wells

Harris Wells